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MEMO ENDORSED

April 24, 2025

Via ECF

Hon. Jessica G.L. Clarke
U.S. District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Application GRANTED. The conference scheduled for June 11, 2025 is ADJOURNED *sine die*. Plaintiff has until June 25, 2025 to file motion for default judgment. The Clerk of Court is directed to terminate ECF No. 17.

Dated: April 25, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke".

JESSICA G. L. CLARKE
United States District Judge

Re: Gregory P. Mango v. Smoki USA, Inc.
Case No: 7:25-cv-01244-JGLC

Dear Judge Clarke:

We represent plaintiff Gregory P. Mango (“*Plaintiff*”) in the above-captioned matter and write pursuant to Section 2.e of the Court’s Individual Practices to respectfully request an adjournment *sine die* of the June 11, 2025, Initial Pretrial Conference [ECF No. 9; *see also paperless order entered on April 22, 2025*], in light of the default of defendant Smoki USA, Inc. (“*Defendant*”).

On April 10, 2025, the Clerk of the Court entered default against Defendant. [ECF No. 16]. Since said entry, Plaintiff, via counsel, has been attempting to contact Defendant in the hope of resolving this case and in an effort to avoid the waste of judicial resources, which would result from Defendant filing an appearance only after a motion for default judgment had been filed.

As such, in light of the Defendant’s default in this action, Plaintiff respectfully requests that the June 11, 2025, Initial Conference be adjourned *sine die*. In the event Plaintiff is unable to resolve the case within thirty (30) days of this submission, Plaintiff intends to file a motion for default judgment. No previous requests for the relief sought herein have been made and, if granted, the extension would have no effect on any other existing deadlines. As Defendant is in default in this matter, Plaintiff is unable to confer with Defendant on whether it consents or opposes to the requested relief.

Thank you for your consideration of this request.

Respectfully submitted,

SANDERS LAW GROUP

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert